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OFFICE OF  
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June 30, 2000

**By Hand**

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: PETITION OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES,  
INC. AND TCG MIDSOUTH INC. FOR LEAVE TO INTERVENE  
Docket No. 00-00544


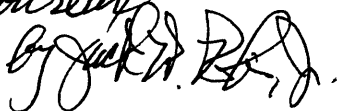
Dear Mr. Waddell:

Pursuant to the decision of the TRA at the May 9, 2000, Authority Conference and the June 26, 2000, Reminder of Notice of Filing Schedule, AT&T Communications of the South Central States, Inc. and TCG MidSouth Inc. respectfully petitions the Tennessee Regulatory Authority ("TRA") for leave to intervene in this proceeding.

I have also enclosed a check in the amount of \$25.00 for the filing fee.

If you have questions, please call me.

Sincerely,

  
Jim Lamoureux 

Encls.

POSTED  
6-30-00

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

In Re: Generic Docket to Establish UNE  
Prices for line sharing per FCC 99-355,  
and riser cable and terminating wire as  
ordered in TRA Docket 98-0123

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**PETITION OF AT&T  
COMMUNICATIONS OF THE  
SOUTH CENTRAL STATES, INC.  
AND TCG MIDSOUTH INC.  
FOR LEAVE TO INTERVENE**

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Pursuant to the decision of the TRA at the May 9, 2000, Authority Conference and the June 26, 2000, Reminder of Notice of Filing Schedule, AT&T Communications of the South Central States, Inc. and TCG MidSouth Inc. (collectively, "AT&T") respectfully petitions the Tennessee Regulatory Authority ("TRA") for leave to intervene in this proceeding. In support of its Petition, AT&T states that:

1. AT&T is a corporation organized and formed under the laws of the State of Delaware, having an office at 1200 Peachtree Street, N.E., Atlanta, Georgia 30309. AT&T and TCG are telecommunications carriers authorized to provide services throughout Tennessee. AT&T Corp., the parent corporation of AT&T Communications of the South Central States, Inc., acquired Teleport Communications Group, Inc., the parent company of TCG MidSouth Inc., effective July 23, 1998. AT&T Communications of the South Central States, Inc. and TCG MidSouth Inc. are both authorized to do business and are doing business in Tennessee.

2. Pursuant to FCC Order 99-355 and pursuant to TRA Docket No. 98-00123, the TRA has convened this proceeding for the purpose of establishing prices for line sharing and for riser cable and network terminating wire.

3. Although not specifically identified by the TRA, this proceeding is also subject to the FCC's order establishing its national list of UNEs (FCC 99-238, the "UNE Remand Order") and the FCC's order establishing the pricing methodology for UNEs (FCC 96-325, the "Local Competition Order").

4. This proceeding is also subject to Title 65 of the Tennessee Code, including T.C.A. § 65-4-124, which requires that all telecommunications providers shall "to the extent that it is technically and financially feasible, be provided desired features, functions, and services promptly and on an unbundled and non-discriminatory basis from all other telecommunications providers."

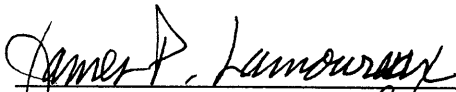
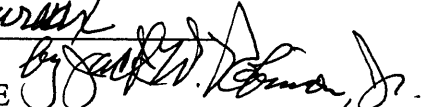
5. AT&T's legal rights, duties and other legal interests will be substantially affected by decisions and orders made by the TRA in this proceeding. The interests of justice and the orderly and prompt conduct of the proceeding will not be impaired by allowing AT&T to intervene. Therefore, pursuant to T.C.A. §4-5-310, AT&T should be given leave to intervene.

6. Because the TRA, in Docket No. 97-01262, adopted BellSouth's recurring and non-recurring cost studies for various elements, AT&T does not intend to submit its own cost studies in this proceeding. Rather, AT&T will review the cost studies submitted by BellSouth and will recommend any appropriate revisions that should be made to those cost studies and the corresponding rates which result.

7. Based on the current schedule, AT&T does not believe the parties will have sufficient time to review the cost studies that are filed in order to be able to file reply comments and proposed revised rates. Accordingly, AT&T intends to request that the TRA postpone the July 15, 2000, deadline for the filing of reply comments.

WHEREFORE, AT&T prays that the Authority grant AT&T leave to intervene in this contested case.

Respectfully submitted,

  
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(404) 810-4196

Attorney for AT&T Communications of the  
South Central States, Inc. and TCG MidSouth  
Inc.

June 30, 2000